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*Proposed Attorneys for Robert E. Atkinson, Chapter 7 Trustee*

6 **UNITED STATES BANKRUPTCY COURT**  
 7 **DISTRICT OF NEVADA**

9 In re METAL PARTNERS REBAR, LLC,

10 Debtor.

11  Affects Metal Partners Rebar, LLC  
 12  Affects BGD LV Holding, LLC  
 13  Affects BRG Holding, LLC  
 14  Affects BCG Ownco, LLC

Case No. BK-S-20-12878-ABL (**Lead Case**)

**Jointly Administered with:**

Case No. BK-S-20-12876-ABL  
 Case No. BK-S-20-12879-ABL  
 Case No. BK-S-20-12880-ABL

Chapter 7

**Adversary Proceeding: 23-01069-ABL**

16 TROY S. FOX, CHAPTER 7 TRUSTEE,

17 Plaintiff,

18 v.

19 TRAXYS NORTH AMERICA LLC,

20 Defendant.

**NOTICE OF HEARING ON TRUSTEE'S  
 MOTION TO APPROVE SETTLEMENT  
 AGREEMENT WITH TRAXYS NORTH  
 AMERICA LLC (FRBP 9019)**

Hearing Date: June 13, 2023

Hearing Time: 10:00 a.m.

22 NOTICE IS HEREBY GIVEN that a hearing on Trustee's Motion to Approve Settlement  
 23 Agreement with Traxys North America LLC (FRBP 9019) on the above referenced case is  
 24 scheduled to be heard on the 13<sup>th</sup> day of June 2023 at 10:00 a.m.

25 The hearing will be held at the date and time specified above via telephone conference.  
 26 Conference line: (669) 254-5252; Meeting ID: 161 166 2815; Passcode: 115788#. Any

1 Opposition must be filed pursuant to Local Rule 9014(d)(1).Please see the Court's Calendars  
2 posted on the website for the appropriate call-in number and code.

3 Local Rule 9014(d)(1): "Except as set out in subsection (3) below, any oppositions to a  
4 motion must be filed, and service of the opposition must be completed on the movant, no later  
5 than fourteen (14) days preceding the hearing date for the motion. The opposition must set forth  
6 all relevant facts and any relevant legal authority. An opposition must be supported by affidavits  
7 or declarations that conform to the provisions of subsection (c) of this rule."

8 If you object to the relief requested, you must file a WRITTEN response to this pleading  
9 with the court. You must also serve your written response on the person who sent you this notice.

10 If you do not file a written response with the court, or if you do not serve your written  
11 response on the person who sent you this notice, then:

12 The court may refuse to allow you to speak at the scheduled hearing; and

13 The court may rule against you without formally calling the matter at the hearing.

14 NOTICE IS FURTHER GIVEN that the hearing on this matter may be continued from  
15 time to time without further notice.

16 Dated this 28<sup>th</sup> day of April, 2023.

17 Submitted by:  
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20 /s/ Jason A. Imes, Esq.  
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